

George Haines, Esq.
Nevada Bar No. 9411
Gerardo Avalos, Esq.
Nevada Bar No. 15171
FREEDOM LAW FIRM
8985 S. Eastern Ave, Suite 350
Las Vegas, Nevada 89123
(702) 880-5554
(702) 385-5518 (fax)
Ghaines@freedomlegalteam.com
Counsel for Plaintiff John Pegnam

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

John Pegnam,

Plaintiff,

v.

Lac du Flambeau Band of Lake
Superior Chippewa Indians dba
Niizhwaaswi, LLC dba Loan at Last,

Defendant.

Case No.: 2:21-cv-01867-GMN-VCF

**Unopposed Motion for Extension of
Time for Defendant to File a
Responsive Pleading to Plaintiff's
First Amended Complaint**

(First Request)

1 John Pegnam (“Plaintiff”), by and through counsel, hereby files his
2 Unopposed Motion for Extension of Time For Defendant to File a Responsive
3 Pleading to Plaintiff’s First Amended Complaint, and requests an order
4 extending the deadline for Defendant to file a responsive pleading to
5 Plaintiff’s First Amended Complaint by thirty (30) days, from the current
6 deadline of March 15 , 2022 to **April 15, 2022**. This motion is submitted in
7 compliance with LR IA 6-1 and LR IA 6-2.

8 Good cause exists for the requested extension, as counsel for Defendant
9 is in the process of obtaining and reviewing the relevant file materials and
10 information necessary to respond to the allegations set forth in the Complaint.

11 Additionally, the parties are actively engaged in settlement negotiations
12 and hope to resolve the matter prior to incurring further litigation expenses.

13 The parties agree that an extension of Defendant’s time to answer the
14 complaint furthers the interests of this litigation. Accordingly, Plaintiff does
15 not oppose the requested extension and the extension is not being requested in
16 bad faith or to delay these proceedings unnecessarily.

17 This is the first request for an extension of Defendant’s responsive
18 pleading deadline.

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1 For the foregoing reasons, Plaintiff requests that the Court issue an
2 order extending the date, to **April 15, 2022**, on which Defendant must answer
3 or otherwise respond to Plaintiff's Complaint.
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5 Dated: March 3, 2022.

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7 **FREEDOM LAW FIRM**

8 /s/ Gerardo Avalos
9 Gerardo Avalos, Esq.
10 8985 S. Eastern Ave., Suite 350
11 Las Vegas, NV 89123
12 *Counsel for Plaintiff John Pegnam*
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15 IT IS SO ORDERED:

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18 UNITED STATES MAGISTRATE JUDGE

19 DATED: 3-3-2022
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